



U.S. Department of Justice

United States Attorney  
Southern District of New York

United States District Courthouse  
300 Quarropas Street  
White Plains, New York 10601

October 31, 2022

**By ECF, Hand and Email**

The Honorable Cathy Seibel  
United States District Judge  
300 Quarropas Street  
Southern District of New York  
White Plains, NY 10601-4150

**Re: *United States v. Kaitlyn Gold*, 19 Cr. 470 (CS)**


Dear Judge Seibel:

Please find enclosed the Government's proposed order of restitution in the total amount of \$1,438,629. Schedule A will be submitted separately under seal.

Please also find enclosed the Government's proposed preliminary order of forfeiture/money judgment. As specified therein, the Government requests a money judgment in the amount of \$120,386.91,<sup>1</sup> representing approximately 20% of the income defendant Kaitlyn Gold received from AMA Laboratories from 2012 through April 2017. The Government is requesting 20% of Gold's income during this period in order to avoid unwarranted disparities with similarly situated codefendants David Winne, No. 19 CR 379 (VB) and Patrycja Wojtowicz, No. 19 CR 424 (VB), who were recently sentenced by the Hon. Vincent L. Briccetti. In both cases, Judge Briccetti ordered forfeiture of 20% of the income Winne and Wojtowicz received from AMA during the same period.

Respectfully submitted,

DAMIAN WILLIAMS  
United States Attorney

By:   
Jeffrey C. Coffman  
Assistant United States Attorney

<sup>1</sup> This letter and the attached proposed forfeiture order amend the Government's previously submitted letter and proposed forfeiture order, Dkt. No. 35, which set forth an incorrect forfeiture amount.

Honorable Cathy Seibel  
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